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*Attorneys for Plaintiffs Audra McCowan and Jennifer Allen*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

AUDRA McCOWAN *and*  
JENNIFER ALLEN,

Plaintiffs,

v.

CITY OF PHILADELPHIA, *et al.*,

Defendants.

Civil Action No. 19-cv-3326-KSM

**Plaintiffs' Daubert Motion to Exclude Opinion  
Testimony of Dr. Reed Goldstein**

**Federal Rule of Evidence 702**

**Notice of Motion**

Plaintiffs Audra McCowan and Jennifer Allen respectfully request an Order pursuant to Federal Rule of Evidence 702 precluding the testimony of Defendants' expert, Dr. Reed Goldstein. In support of their motion, Plaintiffs rely on the attached Brief. Plaintiffs' supporting exhibits are being emailed to Chambers under seal. A proposed form of order is attached.

Respectfully submitted,

**DEREK SMITH LAW GROUP, PLLC**

/s/ Ian M. Bryson, Esquire

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